

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ABC CORPORATION I, ABC)	
CORPORATION II.,)	
)	
Plaintiffs,)	
)	Case No.: 20-cv-4806
v.)	
)	Judge Thomas M. Durkin
THE PARTNERSHIPS AND)	Magistrate Judge Jeffrey Cole
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A,)	
)	
Defendants.)	
)	
)	

**DECLARATION OF ARTHUR TAN-CHI YUAN
IN SUPPORT OF AN OPPOSITION TO JIANGYOU-US'S LACK OF PERSONAL
JURISDICTION**

I, Arthur Tan-Chi Yuan, declare as follows:

1. I am one of the attorneys for Plaintiffs Hangzhou Chic Intelligent Technology Co. and Unicorn Global, Inc. and am an attorney licensed in Illinois.
2. I am a native speaker of Chinese and have personally reviewed all materials provided in the attached Exhibits and have firsthand knowledge of the statements below. If called as a witness, I could and would testify to the statements made herein.
3. Jiangyou identifies its business name on its Amazon registration page as Shenzhen Jiangyou Jinchukou Youxian Gongsi. This is consistent with Jiangyou-US's interrogatory response, which identified its business name as "Shenzhen Jiangyou Jinchukou Youxiangongsi." "Jinchukou Youxian Gongsi" is phonetic translation of "Import Export Co., Ltd."

4. In its Amazon registration page, the named defendant “Gyroor” (hereinafter, “Defendant Gyroor”) identifies its business name as “Shenzhen Chetaidou Keji Youxian Gongsi.” This is consistent with Defendant Gyroor’s interrogatory response, which identified its business name as “Shenzhen Chetadou Keji (Technology) Youxian Gongsi (Co., Ltd.).” “Keji Youxian Gongsi” is phonetic translation of “Technology Co., Ltd.” in Chinese. Exhibit 1 is a true and accurate reproduction of web capture that identifies the merchant information on Amazon.com.

5. The US mark  is also displayed on Defendant Gyroor’s Amazon merchant page and all infringing products associated with the eight Gyroor Defendants.

6. The registered owner of US mark  is Shenzhen Chitado Technology Co., Ltd. (“Chitado”). Exhibit 2 is a true and accurate reproduction of United States Trademark Certificate of trademark . The spelling of “Chitado” in the Trademark Certificate is slightly different from that of “Chetaidou” on Defendant Gyroor’s Amazon merchant page.. Slight spelling differences with similar phonetic pronunciations are not uncommon when translating the same word from Chinese script to the Latin alphabet.

7. As a native Chinese speaker, I understand “Shenzhen Chitado Technology Co., Ltd.” to be the official English translation of the Chinese characters 深圳车泰斗科技有限公司 . Therefore, these Chinese characters refer to Defendant Gyroor.

8. These Chinese characters 深圳车泰斗科技有限公司 are prominently displayed in the “about us” page on Gyroor.cn. Exhibit 3 is a true and accurate web capture of <http://gyroor.cn/about>. I added the English annotations to certain texts in Exhibit 3 to create Exhibit 4.

9. In Exhibit 4, annotations 1, 2 and 3 show where that the name

深圳车泰斗科技有限公司 appears on pages 1, 4, and 5.



10. In Exhibit 3, the Chinese characters “疆游” are also prominently displayed next to “GYROOR” in the header.



11. The English phonetic translation of “疆游” is “Jiangyou.” I have identified these characters in annotations on pages 4 and 5 in Exhibit 4.

12. Exhibit 5 is a true and accurate reproduction of a web capture from the Chinese



trademark office that lists classes of goods where “疆游” is used as a trademark. I added the English translation to the heading (shown in red boxes) in pages 1 and 3 of Exhibit 5 to create Exhibit 6.

13. In particular, Exhibits 5-6 show that 深圳车泰斗科技有限公司 (i.e., Shenzhen



Chitado Technology Co., Ltd.) owns the mark “疆游” in about 49 different entries in various classes of goods and services.

14. Exhibit 7 is a true and accurate reproduction of a web capture from the Chinese trademark office that lists classes of goods where GYROOR is used as a trademark. I added the English translation to the heading (shown in red boxes) on pages 1 and 3 of Exhibit 7 to create Exhibit 8.

15. In particular, Exhibit 7 shows that 深圳车泰斗科技有限公司 (i.e., Shenzhen Chitado Technology Co., Ltd.) owns the mark GYROOR in about 49 different entries in classes of goods and services.

16. In addition, in an enterprise credit report from tianyancha.com, a newly created



Chinese entity also bears the mark in its company name,

深圳市疆游企业管理合伙企业（有限合伙）. The English translation of that longer string of Chinese characters is “Shenzhen **Jiangyou** Business Management Partnership (Limited Partnership)” (emphasis added).

17. The names of the shareholders of Shenzhen Jiangyou Business Management Partnership (Limited Partnership) match the names of the shareholders of Shenzhen Chitado Technology Co., Ltd (a/k/a Defendant Gyroor). Exhibit 9 is a true and accurate reproduction of a professional enterprise credit report generated on October 27, 2021 from tianyancha.com for “Shenzhen Jiangyou Business Management Partnership (Limited Partnership)” and Exhibit 11 is a true and accurate reproduction of a professional enterprise credit report generated on October 27, 2021 from tianyancha.com for Shenzhen Chitado Technology Co., Ltd. I added the English translations to various texts (shown in red boxes) and identified these shareholders’ names in Exhibit 10 and Exhibit 12.

18. The shareholders of Shenzhen Jiangyou Business Management Partnership

(Limited Partnership) are 张殿旋 and 周邓金, as indicated on page 9. The

legal representative is 张殿旋 , as noted on pages 9-10 of the PDF document. These names are marked by orange boxes throughout Exhibit 10.

19. These two individuals are also noted in the corporate structure of Shenzhen Chitado Technology Co., Ltd (a/k/a Defendant Gyroor). I have marked these names with orange

boxes on pages 12-15 of Exhibit 12. In fact, 张殿旋 is also the legal representative of Shenzhen Chitado Technology Co., Ltd (a/k/a Defendant Gyroor).

I declare under penalty of perjury that the foregoing is a true and correct.

Executed on October 29, 2021, Chicago, IL.

/s/ Arthur Tan-Chi Yuan
Arthur T. Yuan.